

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ALEXANDRA POPOVCHAK and OSCAR
GONZALEZ, individually and on behalf of all
others similarly situated,

Plaintiffs,

-against-

UNITEDHEALTH GROUP INCORPORATED,
UNITED HEALTHCARE INSURANCE
COMPANY, UNITED HEALTHCARE
SERVICES, INC., and UNITED HEALTHCARE
SERVICE LLC

Defendants.
-----X

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/24/23

1:22-cv-10756-LLS

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME TO
RESPOND TO COMPLAINT**

The undersigned counsel, on behalf of Plaintiffs Alexandra Popovchak and Oscar Gonzalez ("Plaintiffs") and Defendants UnitedHealth Group Incorporated, United Healthcare Insurance Company, United Healthcare Services, Inc., and United Healthcare Service LLC ("Defendants"), hereby stipulate and agree as follows:

WHEREAS, Plaintiffs filed the Complaint in this action on December 21, 2022;

WHEREAS, Plaintiffs served the Complaint on all Defendants on January 4, 2023;

WHEREAS, Defendants' deadline to answer, move, or otherwise respond to the Complaint is currently set for January 25, 2023;

WHEREAS, the parties have conferred regarding Defendants' time to answer, move, or otherwise respond to the Complaint and believe an extension of time is warranted;

WHEREAS, this is the parties' first request to extend the time of any filing;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, that:

1. The time for Defendants to answer, move, or otherwise respond to the Complaint

shall be extended to March 24, 2023.

2. Nothing in this Stipulation shall prejudice any party's rights of any kind, including the right to seek further relief from the Court concerning the time for filing and service of any answer or motion papers.

Dated: January 19, 2023

ZUCKERMAN SPAEDER LLP

By: 

Dr. Brian Hufford
Jason S. Cowart
485 Madison Avenue, 10th Floor
New York, NY 10022
Tel: (212) 704-9600
dbhufford@zuckerman.com
jcowart@zuckerman.com

Caroline E. Reynolds
Trillium Chang
1800 M Street, NW, Suite 1000
Washington, DC 20036
Tel: (202) 778-1800
creynolds@zuckerman.com
tchang@zuckerman.com

COHEN HOWARD, LLP

Leslie Howard
766 Shrewsbury Avenue, Suite 200
Tinton Falls, NJ 07724
Tel: (732) 747-5202
lhoward@cohenhoward.com

Attorneys for Plaintiffs

GIBSON, DUNN & CRUTCHER LLP

By: 

James Hallowell
200 Park Avenue
New York, NY 10166
Telephone: +1 212.351.3804
JHallowell@gibsondunn.com

Heather L. Richardson (*pro hac vice*
forthcoming)
Lauren M. Blas (*pro hac vice forthcoming*)
333 South Grand Avenue
Los Angeles, CA 90071
Telephone: +1 213.229.7409
HRichardson@gibsondunn.com
LBlas@gibsondunn.com

Attorneys for Defendants

SO ORDERED

DATED: January 24, 2023

Louis L. Stanton
HON. LOUIS L. STANTON
UNITED STATES JUDGE